

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

In re: Equifax Inc. Customer Data
Security Breach Litigation

THEODORE H. FRANK and
DAVID R. WATKINS,

Objectors.

MDL No. 17-2800-TWT

CONSUMER ACTIONS

Chief Judge Thomas W. Thrash, Jr.

**FRANK AND WATKINS' MOTION TO STRIKE
THE DECLARATION OF PROFESSOR ROBERT H. KLONOFF**

Pursuant to Federal Rule of Evidence 702 and Civil Local Rule 26.2(C),
Objectors Frank and Watkins move to strike the Declaration of Professor
Robert H. Klonoff (Dkt. 858-2) for the reasons set forth in the accompanying
memorandum of law.

Dated: December 2, 2019.

/s/ Melissa A. Holyoak

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*Attorneys for Objectors David R. Watkins
and Theodore H Frank*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed with this Court via its CM/ECF service, which will send notification of such filing to all counsel of record.

Dated: December 2, 2019.

/s/ Melissa A. Holyoak